COURT FILE NO.: CV-22-0005514-00CP

ONTARIO

SUPERIOR COURT OF JUSTICE

BETWEEN:

ZEXI LI

Plaintiff/Moving Party

-and-

CHRIS BARBER, BENJAMIN DICHTER, TAMARA LICH, PATRICK KING and JOHN DOE 1, JOHN DOE 2, JOHN DOE 3, JOHN DOE 4, JOHN DOE 5, JOHN DOE 6, JOHN DOE 7, JOHN DOE 8, JOHN DOE 9, JOHN DOE 10, JOHN DOE 11, JOHN DOE 12, JOHN DOE 13, JOHN DOE 14, JOHN DOE 15, JOHN DOE 16, JOHN DOE 17, JOHN DOE 18, JOHN DOE 19, JOHN DOE 20, JOHN DOE 21, JOHN DOE 22, JOHN DOE 23, JOHN DOE 24, JOHN DOE 25, JOHN DOE 26, JOHN DOE 27, JOHN DOE 28, JOHN DOE 29, JOHN DOE 30, JOHN DOE 31, JOHN DOE 32, JOHN DOE 33, JOHN DOE 34, JOHN DOE 35, JOHN DOE 36, JOHN DOE 37, JOHN DOE 38, JOHN DOE 39, JOHN DOE 40, JOHN DOE 41, JOHN DOE 42, JOHN DOE 43, JOHN DOE 44, JOHN DOE 45, JOHN DOE 46, JOHN DOE 47, JOHN DOE 48, JOHN DOE 49, JOHN DOE 50, JOHN DOE 51, JOHN DOE 52, JOHN DOE 53, JOHN DOE 54, JOHN DOE 55, JOHN DOE 56, JOHN DOE 57, JOHN DOE 58, JOHN DOE 59 and JOHN DOE 60

Defendants/Responding Parties

Proceeding under the *Class Proceedings Act, 1992*

RESPONDING MOTION RECORD

February 6, 2022

JUSTICE CENTRE FOR CONSTITUTIONAL FREEDOMS
#[redacted]
Calgary, Alberta
Tel: 4[redacted]
Fax: 5[redacted]

Keith Wilson ([redacted]
keith[redacted]

Eva Chipiuk (AB#: [redacted]

Allison Pejovi[redacted]

Andre Memauri (SK#: [redacted]

Counsel for the Defendants Chris Barber, Tamara Lich, and Benjamin Dichter

TO: **CHAMP & ASSOCIATES**
Barristers and Solicitors
[redacted]
Ottawa, ON [redacted]

Paul Champ (LSO# [redacted])
T: 613-[redacted]
F: 613[redacted]
Email: pchamp[redacted]

Counsel for the Plaintiff

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TAB 1

COURT FILE NO.: CV-22-00088514-00CP

FORM 14E

Courts of Justice Act

ONTARIO
SUPERIOR COURT OF JUSTICE

BETWEEN:

ZEXI LI

Plaintiff

-and-

CHRIS BARBER, BENJAMIN DICHTER, TAMARA LICH, PATRICK KING, and JOHN DOE 1, JOHN DOE 2, JOHN DOE 3, JOHN DOE 4, JOHN DOE 5, JOHN DOE 6, JOHN DOE 7, JOHN DOE 8, JOHN DOE 9, JOHN DOE 10, JOHN DOE 11, JOHN DOE 12, JOHN DOE 13, JOHN DOE 14, JOHN DOE 15, JOHN DOE 16, JOHN DOE 17, JOHN DOE 18, JOHN DOE 19, JOHN DOE 20, JOHN DOE 21, JOHN DOE 22, JOHN DOE 23, JOHN DOE 24, JOHN DOE 25, JOHN DOE 26, JOHN DOE 27, JOHN DOE 28, JOHN DOE 29, JOHN DOE 30, JOHN DOE 31, JOHN DOE 32, JOHN DOE 33, JOHN DOE 34, JOHN DOE 35, JOHN DOE 36, JOHN DOE 37, JOHN DOE 38, JOHN DOE 39, JOHN DOE 40, JOHN DOE 41, JOHN DOE 42, JOHN DOE 43, JOHN DOE 44, JOHN DOE 45, JOHN DOE 46, JOHN DOE 47, JOHN DOE 48, JOHN DOE 49, JOHN DOE 50, JOHN DOE 51, JOHN DOE 52, JOHN DOE 53, JOHN DOE 54, JOHN DOE 55, JOHN DOE 56, JOHN DOE 57, JOHN DOE 58, JOHN DOE 59 and JOHN DOE 60

Defendants

AFFIDAVIT OF TAMARA LICH
(Sworn February 5, 2022)

I, **Tamara Lich,** of City of Medicine Hat, in the Province of Alberta, MAKE OATH AND SAY:

1. I am one of the Defendants herein, and as such have personal knowledge of the matters hereinafter deposed to.

2. I reside in the City of Medicine Hat, Alberta and while I did invite truckers to come to Ottawa to peacefully protest the Covid-19 vaccine mandates, there are many truckers that I do not know and never been in prior contact with. Based on my discussions with truckers and what I have seen by way of licence plates, there are truckers unknown to me that have come to Ottawa from all provinces and as far as the United States.

3. I do not control the truckers and other participants in the current protest in Ottawa.

4. I do not own or posses a semi-truck or truck.

SWORN REMOTELY by videoconference by Tamara Lich, at the City of Ottawa, Ontario, before me at the City of Brampton, this 5th day of February 2022 in accordance with O. Reg. 431/20 Administering Oath or Declaration Remotely

Henna Parmar

Barrister & Solicitor, etc.

Tamara Lich

TAMARA LICH

ZEXI LE

Plaintiff (Moving Party)

and

CHRIS BARBER, et al.

Defendants (Responding Parties)

Court File No.: CV-22-00088514-00CP

ONTARIO
SUPERIOR COURT OF JUSTICE

AFFIDAVIT OF
TAMARA LICH

JUSTICE CENTRE FOR CONSTITUTIONAL FREEDOMS
[redacted]
Calgary, Alberta
Tel: 40[redacted]
Fax: 5[redacted]

Keith Wilson (AB#: 1[redacted]
keith[redacted]

Eva Chipiuk (AB#: 1[redacted]

Allison Pejovic

Andre Memauri (SK#:

Counsel for the Defendants, Chris Barber, Banjamin Dichter and Tamara Lich

TAB 2

COURT FILE NO.: CV-22-00088514-00CP

FORM 14E

Courts of Justice Act

ONTARIO

SUPERIOR COURT OF JUSTICE

BETWEEN:

ZEXI LI

Plaintiff

-and-

CHRIS BARBER, BENJAMIN DICHTER, TAMARA LICH, PATRICK KING, and JOHN DOE 1, JOHN DOE 2, JOHN DOE 3, JOHN DOE 4, JOHN DOE 5, JOHN DOE 6, JOHN DOE 7, JOHN DOE 8, JOHN DOE 9, JOHN DOE 10, JOHN DOE 11, JOHN DOE 12, JOHN DOE 13, JOHN DOE 14, JOHN DOE 15, JOHN DOE 16, JOHN DOE 17, JOHN DOE 18, JOHN DOE 19, JOHN DOE 20, JOHN DOE 21, JOHN DOE 22, JOHN DOE 23, JOHN DOE 24, JOHN DOE 25, JOHN DOE 26, JOHN DOE 27, JOHN DOE 28, JOHN DOE 29, JOHN DOE 30, JOHN DOE 31, JOHN DOE 32, JOHN DOE 33, JOHN DOE 34, JOHN DOE 35, JOHN DOE 36, JOHN DOE 37, JOHN DOE 38, JOHN DOE 39, JOHN DOE 40, JOHN DOE 41, JOHN DOE 42, JOHN DOE 43, JOHN DOE 44, JOHN DOE 45, JOHN DOE 46, JOHN DOE 47, JOHN DOE 48, JOHN DOE 49, JOHN DOE 50, JOHN DOE 51, JOHN DOE 52, JOHN DOE 53, JOHN DOE 54, JOHN DOE 55, JOHN DOE 56, JOHN DOE 57, JOHN DOE 58, JOHN DOE 59 and JOHN DOE 60

Defendants

AFFIDAVIT OF JOSEPH ANDRÉ CHRISTIAN GAGNÉ
(Sworn February 5, 2022)

I, **Joseph André Christian Gagné,** of City of Ottawa, in the Province of Ontario, MAKE OATH AND SAY:

1. I have personal knowledge of the facts and matters hereinafter deposed to.

2. I am a resident of Ottawa, in the Province of Ontairo, and live in the Hintonburg neighborhood, which is about four kilometers west of Parliament Hill.

3. I work for Statistics Canada, a department of the Federal Government.

4. I was downtown Ottawa on Monday, January 31st, 2022 to see the demonstrations occurring in front of Parliament Hill. This is the first time I went downtown since the "Freedom Convoy" protest arrived.

5. I arrived at about 2pm and left at about 4pm.

6. In summary, I observed a large number of trucks on Wellington Street including across from the Parliament building.

7. There were many protestors on the street and sidewalks and on Parliament Hill. These including men, women, children and people of diverse ethnic backgrounds.

8. There was a festive and happy mood throughout my time there. The protesters were peaceful and respectful, I saw no violence or harassment. I was not impeded in any way, and could walk about freely and safely. I did not see any hateful symbols, in fact, I saw an abundance of Canada flags and Quebec flags as well as countless signs calling for freedom and the end of Covid related mandates. I did see some anti-Trudeau flags using harsh language. However, I would describe the scene as a peaceful, pro-freedom demonstration.

9. I also went downtown Ottawa on Tuesday, February 1st from about 2pm to 4pm. The pervious day, there were dozens of trucks along Wellington street. They would

intermittently sound their horns but it was not constant. Many people walked the streets peacefully protesting. Many of them carried Canada flags and signs. It was a peaceful and fun atmosphere with dancing and public speakers taking turns at a microphone while people listened on. I did not observe anyone being harassed or intimidated. I felt totally safe.

10. I again visited downtown Ottawa yesterday, which was Friday, February 4th from noon until 2 pm. The peaceful demonstrations continued. I did notice OPP and Ottawa Police along Wellington Street, as I had on previous occasions. I observed friendly interactions between the police and the demonstrators and no hostility whatsoever.

11. I passed by the Terry Fox statue in from of Parliament Hill on Monday, Tuesday and Friday. Contrary to what I have seen in the media, I did not see that the Terry Fox statue was desecrated or defaced in any way. In fact, I saw flowers at the feet of the statue as demonstrators walked by.

12. My everyday life has not been disrupted by any noise related to the downtown demonstrations. I do not hear any honking near my home. The only honking I have heard is on Wellington Street, particularly across from Parliament Hill.

13. I swear this affidavit bonafide and for no other improper use.

Sworn Remotely by videoconference by Christian Gagne stated as being located in Ottawa, Ontario before me at the City of Hamilton in the Province of Ontario, this 5 day of February, 2022.

Barrister and
Solicitor, etc.

Christian Gagné

Joseph André Christian Gagné

ZEXI LE

Plaintiff (Moving Party)

and

CHRIS BARBER, et al.

Defendants (Responding Parties)

Court File No.: CV-22-00088514-00CP

ONTARIO
SUPERIOR COURT OF JUSTICE

AFFIDAVIT OF
JOSEPH ANDRE CHRISTIAN GAGNE

JUSTICE CENTRE FOR CONSTITUTIONAL FREEDOMS
[redacted]
Tel: 4[redacted]
Fax: [redacted]

Keith Wilson (AB#: [redacted]
keith[redacted]

Eva Chipiuk (AB#: [redacted]

Allison Pejovi[redacted]

Andre Memauri (SK#: [redacted]

Counsel for the Defendants, Chris Barber, Banjamin Dichter and Tamara Lich

TAB 3

COURT FILE NO.: CV-22-00088514-00CP

FORM 14E

Courts of Justice Act

ONTARIO
SUPERIOR COURT OF JUSTICE

BETWEEN:

ZEXI LI

Plaintiff

-and-

CHRIS BARBER, BENJAMIN DICHTER, TAMARA LICH, PATRICK KING, and JOHN DOE 1, JOHN DOE 2, JOHN DOE 3, JOHN DOE 4, JOHN DOE 5, JOHN DOE 6, JOHN DOE 7, JOHN DOE 8, JOHN DOE 9, JOHN DOE 10, JOHN DOE 11, JOHN DOE 12, JOHN DOE 13, JOHN DOE 14, JOHN DOE 15, JOHN DOE 16, JOHN DOE 17, JOHN DOE 18, JOHN DOE 19, JOHN DOE 20, JOHN DOE 21, JOHN DOE 22, JOHN DOE 23, JOHN DOE 24, JOHN DOE 25, JOHN DOE 26, JOHN DOE 27, JOHN DOE 28, JOHN DOE 29, JOHN DOE 30, JOHN DOE 31, JOHN DOE 32, JOHN DOE 33, JOHN DOE 34, JOHN DOE 35, JOHN DOE 36, JOHN DOE 37, JOHN DOE 38, JOHN DOE 39, JOHN DOE 40, JOHN DOE 41, JOHN DOE 42, JOHN DOE 43, JOHN DOE 44, JOHN DOE 45, JOHN DOE 46, JOHN DOE 47, JOHN DOE 48, JOHN DOE 49, JOHN DOE 50, JOHN DOE 51, JOHN DOE 52, JOHN DOE 53, JOHN DOE 54, JOHN DOE 55, JOHN DOE 56, JOHN DOE 57, JOHN DOE 58, JOHN DOE 59 and JOHN DOE 60

Defendants

AFFIDAVIT OF DANIEL BULFORD
(Sworn February 5, 2022)

I, **Daniel Bulford,** of City of Ottawa, in the Province of Ontario, MAKE OATH AND SAY:

1. I have personal knowledge of the facts and matters herein deposed to.

2. I am a recently resigned member of the Royal Canadian Mounted Police ("RCMP"). After 15 years of service, I resigned from the RCMP after publicly speaking opposing the mandates.

3. I am currently working with the Adopt-a-Trucker Volunteer Coordination Center in support of the Freedom Convoy 2022 ("Freedom Convoy"). I am currently working on the ground on logistics, security and safety issues on the ground in Ottawa in support of the Freedom Convoy 2022 ("Freedom Convoy"). I have extensive experience in protective operations for large-scale events in the National Capital Region.

4. I have been involved in tactical planning for many of the large-scale events. I am keenly familiar with what is happening regarding the police presence down around Parliament Hill in the downtown area.

5. I have been working closely with the Ottawa Police Service, the RCMP, and the Parliamentary Protective Service. I have been liaising with them since early last week. Any information that I have received related to any public safety concerns has been immediately forwarded to the respective police service.

6. The safety of the trucker, the Ottawa public, the police, and the first responders is of paramount concern to the Freedom Convoy.

7. On the night of February 1, 2022, I received a complaint from the area of Rideau and Sussex about honking through the night. The caller was supportive of the Freedom Conboy. He said that most of residences in his area were vacant, but he wanted to convey his concern about some elderly residents. I explained that the Freedom Convoy leadership had agreed upon the following schedule out of respect for such concerns:

a. Coordinated unified honk every half an hour for 1 minute, between the hours of 08:00 a.m. and 08:00 p.m., followed by silence between the hours of 08:00 p.m. to 08:00 a.m.

8. I confirmed this schedule in the days following with two separate truck drivers, who advised that during daytime hours, after the coordinated one-minute honk, was up to 10 minutes of distress (S.O.S.) honking signal. Both drivers confirmed that the silent hours between 08:00 p.m. and 08:00 a.m. was still in effect.

9. My primary concern is individuals or groups with potential to deliberately instigate conflict with the Freedom Convoy movement and to discredit the Freedom Convoy. We have seen circulating messaging in the media and social media about people associated with the Freedom Convoy being arrested and charged.

10. I have heard from very reliable sources that people from the movement were not associated with that. Offences related to property damage and just an assault, committed by agitators, were witnessed. This was reported to the police by one of the truckers and one of our volunteer security personnel, and which was ultimately handled by the Ottawa Police Service.

11. What I have seen with my own eyes, on the odd break that I get, are truckers and support of the movement feeding the homeless on Wellington Street and filling their backpacks with food. Truckers have taken a whole trailer full of food to the homeless shelter.

12. I have seen the truckers maintaining the cleanliness of city streets, including picking up discarded masks on the ground, centralized garbage collection, shoveling snow at the War Memorial and the Terry Fox statue, and decorating and providing security for the War

Memorial and Terry Fox statue. I have even seen people set up tents by the Terry Fox statue in order to protect it.

13. I expect that the level of commitment to the City of Ottawa and respecting our traditions in this country is just getting started.

Sworn Remotely by videoconference by Daniel Bulford stated as being located in Ottawa, Ontario before me at the City of Brampton in the Province of Ontario, this 5 day of February, 2022.

Henna Parmar

A Commissioner, etc.

Daniel Bulford

DANIEL BULFORD

ZEXI LE

Plaintiff (Moving Party)

and

CHRIS BARBER, et al.

Defendants (Responding Parties)

Court File No.: CV-22-00088514-00CP

ONTARIO
SUPERIOR COURT OF JUSTICE

AFFIDAVIT OF
DANIEL BULFORD

JUSTICE CENTRE FOR
CONSTITUTIONAL FREEDOMS
[redacted]
Tel: 403-[redacted]

Keith Wilson (AB#: [redacted]

Eva Chipiuk (AB#: [redacted]

Allison Pejovic [redacted]

Andre Memauri (SK#: [redacted]

Counsel for the Defendants, Chris Barber, Banjamin Dichter and Tamara Lich

TAB 4

COURT FILE NO.: CV-22-00088514-00CP

FORM 14E

Courts of Justice Act

ONTARIO

SUPERIOR COURT OF JUSTICE

BETWEEN:

ZEXI LI

Plaintiff

-and-

CHRIS BARBER, BENJAMIN DICHTER, TAMARA LICH, PATRICK KING, and JOHN DOE 1, JOHN DOE 2, JOHN DOE 3, JOHN DOE 4, JOHN DOE 5, JOHN DOE 6, JOHN DOE 7, JOHN DOE 8, JOHN DOE 9, JOHN DOE 10, JOHN DOE 11, JOHN DOE 12, JOHN DOE 13, JOHN DOE 14, JOHN DOE 15, JOHN DOE 16, JOHN DOE 17, JOHN DOE 18, JOHN DOE 19, JOHN DOE 20, JOHN DOE 21, JOHN DOE 22, JOHN DOE 23, JOHN DOE 24, JOHN DOE 25, JOHN DOE 26, JOHN DOE 27, JOHN DOE 28, JOHN DOE 29, JOHN DOE 30, JOHN DOE 31, JOHN DOE 32, JOHN DOE 33, JOHN DOE 34, JOHN DOE 35, JOHN DOE 36, JOHN DOE 37, JOHN DOE 38, JOHN DOE 39, JOHN DOE 40, JOHN DOE 41, JOHN DOE 42, JOHN DOE 43, JOHN DOE 44, JOHN DOE 45, JOHN DOE 46, JOHN DOE 47, JOHN DOE 48, JOHN DOE 49, JOHN DOE 50, JOHN DOE 51, JOHN DOE 52, JOHN DOE 53, JOHN DOE 54, JOHN DOE 55, JOHN DOE 56, JOHN DOE 57, JOHN DOE 58, JOHN DOE 59 and JOHN DOE 60

Defendants

AFFIDAVIT OF NEIL JOSEPH JUDES MCKINNEY
(Sworn February 5, 2022)

I, **Neil Joseph Judes McKinney,** of City of Ottawa, in the Province of Ontario, MAKE OATH AND SAY:

1. I have personal knowledge of the facts and matters hereinafter deposed to.

2. I work as an Officer in Community Initiatives at United Way East Ontario. The majority of my work involves supporting several key initiatives that UWEO has spearheaded, namely: employment for persons with disabilities, employment for Indigenous youth, successful aging for seniors and community wealth building, which includes social procurement. The bulk of my work centres around community building, the fostering of partnerships to improve the quality of life of the most vulnerable or enhancing the capacity of agencies and thereby uplift our collective community engagement to make Ottawa a better city for everyone.

3. I reside in the downtown core in Ottawa, Ontario, approximately 10 blocks south of Parliament Hill.

4. Since the Freedom Convoy 2022 ("Freedom Convoy") arrived in Ottawa on January 28, 2022, I have walked up to Parliament Hill from my home seven or eight times. In doing so, I have visited and spoken with many truckers and supporters of the Freedom Convoy who were located on Metcalfe Street, Slater Street, Kent Street, Bank Street, Wellington Avenue and in Confederation Park. I estimate I have spoken to at least 35 to 40 truckers and supporters since January 28, 2022. In these encounters, I have observed that all of the truckers I met have been, at all times, friendly, courteous, humble, considerate and peaceful. At no time have observed any aggressive or inappropriate behaviour nor have I at any time felt intimidated or unsafe. I state this as someone who was once the victim of assault on the streets of Ottawa in 2004 and who suffered PTSD as a result.

5. I have also observed that the truckers, and their supporters, are made up of the most diverse, inclusive and varied cross-section of Canadian demographics that I have ever

experienced in my life. As examples, I saw a Sikh truck driver with his children, an Indigenous elder giving a blessing to the gathering, a black preacher performing a Sunday service, Canadians of all ethnicities and multiple families with their children.

6. I have observed truckers decorating the Tomb of the Unknown Soldier with flowers as well as guarding it. I also observed an encampment beside the Terry Fox Memorial as a means of watching watch over it. At no point have I ever seen violent or threatening behaviour.

7. My ability to travel in downtown Ottawa, or to and from Parliament Hill has not been impeded by the presence of the truckers. On the contrary, the atmosphere on Parliament Hill has always been safe, welcoming and congenial.

8. Regarding the honking of horns, I live downtown and my sleep at night has not been disrupted by any unwanted sound. I have observed that the truckers do not honk their horns at night. Furthermore, my everyday life has not been disrupted by any noise related to the Freedom Convoy during the day.

9. What I have observed is not in accord with what I have seen in the media or what I have experienced directly either with the truckers, their supporters or the gathering of people on Parliament Hill. The media appears to be framing the convoy and the events around their presence in Ottawa in the most unfavourable, erroneous and distorted manner possible.

10. I swear this affidavit bona fide and for no other improper use.

Sworn Remotely by videoconference by Neil Joseph Judes McKinney stated as being located in Ottawa, Ontario before me at the City of Brampton in the Province of Ontario, this 5 day of February, 2022.

Henna Parmar

A Commissioner, etc.

Neil Joseph Judes McKinney

ZEXI LE

Plaintiff (Moving Party)

and

CHRIS BARBER, et al.

Defendants (Responding Parties)

Court File No.: CV-22-00088514-00CP

ONTARIO
SUPERIOR COURT OF JUSTICE

AFFIDAVIT OF
NEIL JOSEPH JUDES MCKINNEY

JUSTICE CENTRE FOR CONSTITUTIONAL FREEDOMS
#[redacted]

Keith Wilson (AB#: [redacted]

Eva Chipiuk (AB#: [redacted]

Allison Pejovic
[redacted]

Andre Memauri (SK#: [redacted]

Counsel for the Defendants, Chris Barber, Banjamin Dichter and Tamara Lich

TAB 5

COURT FILE NO.: CV-22-00088514-00CP

FORM 14E

Courts of Justice Act

ONTARIO
SUPERIOR COURT OF JUSTICE

BETWEEN:

ZEXI LI

Plaintiff/Moving Party

-and-

CHRIS BARBER, BENJAMIN DICHTER, TAMARA LICH, PATRICK KING, and JOHN DOE 1, JOHN DOE 2, JOHN DOE 3, JOHN DOE 4, JOHN DOE 5, JOHN DOE 6, JOHN DOE 7, JOHN DOE 8, JOHN DOE 9, JOHN DOE 10, JOHN DOE 11, JOHN DOE 12, JOHN DOE 13, JOHN DOE 14, JOHN DOE 15, JOHN DOE 16, JOHN DOE 17, JOHN DOE 18, JOHN DOE 19, JOHN DOE 20, JOHN DOE 21, JOHN DOE 22, JOHN DOE 23, JOHN DOE 24, JOHN DOE 25, JOHN DOE 26, JOHN DOE 27, JOHN DOE 28, JOHN DOE 29, JOHN DOE 30, JOHN DOE 31, JOHN DOE 32, JOHN DOE 33, JOHN DOE 34, JOHN DOE 35, JOHN DOE 36, JOHN DOE 37, JOHN DOE 38, JOHN DOE 39, JOHN DOE 40, JOHN DOE 41, JOHN DOE 42, JOHN DOE 43, JOHN DOE 44, JOHN DOE 45, JOHN DOE 46, JOHN DOE 47, JOHN DOE 48, JOHN DOE 49, JOHN DOE 50, JOHN DOE 51, JOHN DOE 52, JOHN DOE 53, JOHN DOE 54, JOHN DOE 55, JOHN DOE 56, JOHN DOE 57, JOHN DOE 58, JOHN DOE 59 and JOHN DOE 60

Defendants/Responding Parties

Proceeding under the *Class Proceedings Act, 1992*

AFFIDAVIT OF STEPHANE RAYNAUD
(Sworn February 6th, 2022)

I, **Stephane Raynaud,** of City of Ottawa, in the Province of Ontario, MAKE OATH AND SAY:

1. I have personal knowledge of the facts and matters hereinafter deposed to.

2. I am employed as a Sales Consultant for 3DSpider Inc.

3. Since the Freedom Convoy 2022 ("Freedom Convoy") arrived in Ottawa on January 28, 2022, I have attended the protest at Parliament Hill 6 times. In doing so, I have visited and spoken with many truckers and supporters of the Freedom Convoy located on Sussex street, Wellington street, Bank street, Kent street, Lyon street, and Sir John A. MacDonald parkway. I estimate I have spoken to about 50 truckers and supporters since January 28, 2022.

4. What I have observed is that the truckers I have interacted with have, at all times, been extremely friendly, open to great conversations, and smiling. On two occasions, I have brought friends with me, as they were curious but unsure about the protest. Both wore masks and they didn't get any abuse from anyone at any point. I have not observed any aggressive or inappropriate behaviours from truckers or their supporters..

5. However on Saturday January 29th 2022 a pedestrian (I assume a local resident based on his statement) told me "get the fuck out of my city" on Elgin street. I had no prior interaction with this individual. I assume this was due to me wearing a Canadian flag on my backpack.

6. I live 11 blocks from the Parliament Hill. I have had no problems getting in and out of my parking for the duration of the demonstration. I have my bedroom directly facing North toward the Parliament and I have no noise complaint. As for my walk near Wellington Street, while Truck are honking here and there, I would compare noise level similar to a busy street in NYC.

7. I have observed a lot of good things this past week including families coming out together, friendly people, and I have been offered more than my share of hotdogs and hot chocolate by Convoy supporters.

8. My ability to park or to travel in downtown Ottawa, or to and from Parliament Hill has not been impeded by the presence of the truckers. The atmosphere on Parliament Hill is welcoming and pleasant. The best way to describe it is similar to a Canada day celebration on the hill, without the concert, and of course, a lot colder.

Sworn Remotely by videoconference by Stephane Raynaud stated as being located in Ottawa, Ontario before me at the City of Brampton in the Province of Ontario, this 6th day of February, 2022.

Henna Parmar

A Commissioner, etc.

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)
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)
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)

Stephane Raynaud

ZEXI LE

Plaintiff (Moving Party)

and

CHRIS BARBER, et al.

Defendants (Responding Parties)

Court File No.: CV-22-00088514-00CP

ONTARIO
SUPERIOR COURT OF JUSTICE

AFFIDAVIT OF
STEPHANE RAYNAUD

JUSTICE CENTRE FOR
CONSTITUTIONAL FREEDOMS
[redacted]

Keith Wilson (AB#: [redacted]

Eva Chipiuk (AB#: [redacted]

Allison Pejovic [redacted]

Andre Memauri (SK#: [redacted]

Counsel for the Defendants, Chris Barber, Banjamin Dichter and Tamara Lich

ZEXI LE

Plaintiff (Moving Party)

and

CHRIS BARBER, et al.

Defendants (Responding Parties)

Court File No.: CV-22-00088514-00CP

ONTARIO
SUPERIOR COURT OF JUSTICE

RESPONDING MOTION RECORD

JUSTICE CENTRE FOR CONSTITUTIONAL FREEDOMS
[redacted]

Keith Wilson (AB#: [redacted]

Eva Chipiuk (AB#: [redacted]

Allison Pejovic [redacted]

Andre Memauri (SK#: [redacted]

Counsel for the Defendants, Chris Barber, Banjamin Dichter and Tamara Lich